

EXHIBIT H

Improper Assertions of the Attorney-Client Privilege
(Facts and Otherwise Non-legal Information)

ID Number	Custodian	Date	Application	Subject	Author	To	CC	Filename	Treatment	Claim	Privilege Statement
DOC_0808748	Christina Adkins	2/16/2023	Outlook Email	Fwd Alexa's Edits to RLA Document	Christina Adkins	Adam Bitter			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication Elections Division staff and SOS attorney regarding what to include in its recommendation to the Legislature for the election audit
DOC_0806487	Andre Montgomery	12/22/2022	Outlook Email	Legislative Report on CWPP	Andre Montgomery	Christina Adkins; Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding draft Legislative report on November 2020 election
DOC_0808839	Christina Adkins	12/6/2022	Outlook Email	My response to Travis County VR		Elec Legal			Privileged - Withhold	Attorney Client	Email communication between SOS attorney and Election Legal with draft communication to Travis County voter registrar's office regarding election procedures
DOC_0809364	Christina Adkins	1/10/2023	Outlook Email	Portions of Code that impact SOS	Heidi Martinez	Christina Adkins			Privileged - Withhold	Attorney Client	Email communication between SOS attorneys regarding portions of election code that impact SOS duties
STATE177609	Heidi Martinez	11/7/2022	Outlook Email	300 Maria Gonzalez Complaint (re Gilberto Aguilar) - Assignment (HM)	Kate Fisher	Heidi Martinez			Privileged - Redact	Attorney Client	Email communication between SOS attorneys and Elections Division employees regarding compliant that alleges violation of Election Code 276.019
DOC_0815319	Heidi Martinez	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch	Heidi Martinez	Lena Proft			Privileged - Withhold	Attorney Client; Work Product	Emails among SOS attorneys regarding edits to a draft email to Ellis County regarding election procedures
DOC_0819541	Joe Esparza	3/12/2023	Outlook Email	RLA Report - Current Draft	Adam Bitter	Joe Esparza; Sam Taylor	Adam Bitter		Privileged - Withhold	Attorney Client	Email from SOS general counsel to SOS executives discussing draft of Risk Limiting Audit Report
STATE177940	Kristi Hart	10/7/2022	Outlook Email	RE List of Individuals who Complete Poll Watcher Training	Adam Bitter	Kate Fisher	GeneralCounsel; Kristi Hart		Privileged - Redact	Attorney Client	Email communication between SOS general counsel and SOS Elections Division employee regarding Bastrop, TX inquiry on poll watcher training
DOC_0829571	Lena Proft	3/3/2023	Outlook Email	RE DRAFT email to Ellis County re Farmers Branch					Privileged - Withhold	Attorney Client	Email communication between SOS attorneys regarding Ellis County inquiry on election procedures
DOC_0833773	Chuck Pinney	6/6/2022	Outlook Email	FW Election Fraud	Kate Fisher	Keith Ingram; Heidi Martinez	Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833776	Chuck Pinney	6/6/2022	Outlook Email	FW Election Fraud	Heidi Martinez	Keith Ingram	Kate Fisher; Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833779	Chuck Pinney	6/6/2022	Outlook Email	RE Election Fraud	Heidi Martinez	Keith Ingram	Kate Fisher; Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833780	Chuck Pinney	6/6/2022	Outlook Email	FW Election Fraud	Keith Ingram	Kate Fisher; Kristi Hart; Charles Pinney; Heidi Martinez			Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833783	Chuck Pinney	6/6/2022	Outlook Email	RE Election Fraud	Keith Ingram	Heidi Martinez	Kate Fisher; Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833784	Chuck Pinney	6/6/2022	Outlook Email	Re Election Fraud	Keith Ingram	Heidi Martinez	Kate Fisher; Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client; Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX

ID Number	Custodian	Date	Application	Subject	Author	To	CC	Filename	Treatment	Claim	Privilege Statement
DOC_0833916	Chuck Pinney	6/8/2022	Outlook Email	Re 133 Billy Wright Complaint - Assignment (CP)	Charles Pinney	Kate Fisher; Keith Ingram			Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Election Division staff on election complaint about potential violation of Tex Elec Code Sec 61.008 in Elkhart, TX
DOC_0833917	Chuck Pinney	5/24/2022	Outlook Email	140 James Sheridan Complaint - Assignment (CP)	Kate Fisher	Charles Pinney	Heidi Martinez	140 James Sheridan Complaint - Assignment (CP) msg	Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Election Division staff on election complaint about potential violation of Tex Elec Code Sec 61.008 in Elkhart, TX
DOC_0833954	Chuck Pinney	6/6/2022	Outlook Email	RE Election Fraud	Heidi Martinez	Keith Ingram	Kate Fisher; Kristi Hart; Charles Pinney		Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833967	Chuck Pinney	6/6/2022	Outlook Email	Re Election Fraud	Charles Pinney	Kate Fisher; Keith Ingram; Heidi Martinez	Kristi Hart		Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833968	Chuck Pinney	5/5/2022	Outlook Email	98 Bennett Hernandez Complaint - Assignment (CP)	Kate Fisher	Charles Pinney	Heidi Martinez	98 Bennett Hernandez Complaint - Assignment (CP) msg	Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Elections Division regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0833970	Chuck Pinney	4/27/2022	Outlook Email	FW Supplemental Report R Gonzales	LegalTeam	Kate Fisher		FW_Supplemental_Report_R_Gonzales.msg	Privileged - Withhold	Attorney Client;Investigative	Email communication between SOS attorneys and Elections Division staff regarding complaint about alleged violation of Tex Elec Code Sec 276.016 in Lamesa, TX
DOC_0834491	Chuck Pinney	5/25/2022	Outlook Email	Re Travis County EVBB Notice of Defect	Charles Pinney	Lena Proft; Elec Legal			Privileged - Withhold	Attorney Client	Email between SOS attorneys regarding inquiry from Travis County about communicating notices of defect
DOC_0834492	Chuck Pinney	5/25/2022	Outlook Email	RE Travis County EVBB Notice of Defect	Heidi Martinez	Charles Pinney; Lena Proft; Elec Legal			Privileged - Withhold	Attorney Client	Email between SOS attorneys regarding inquiry from Travis County about communicating notices of defect
DOC_0834531	Chuck Pinney	5/25/2022	Outlook Email	RE Travis County EVBB Notice of Defect	Melanie Best	Heidi Martinez; Charles Pinney; Lena Proft; Elec Legal			Privileged - Withhold	Attorney Client	Email between SOS attorneys regarding inquiry from Travis County about communicating notices of defect
DOC_0834535	Chuck Pinney	5/25/2022	Outlook Email	RE Travis County EVBB Notice of Defect	Heidi Martinez	Lena Proft; Elec Legal			Privileged - Withhold	Attorney Client	Email between SOS attorneys regarding inquiry from Travis County about communicating notices of defect
DOC_0805973	Andre Montgomery	8/8/2022	Outlook Email	2020 Election Results E-mails	Andre Montgomery	Heidi Martinez			Privileged - Withhold	Attorney Client; Deliberative Process	Email communication between SOS attorneys regarding election results emails
DOC_0807078	Christina Adkins	10/19/2022	Outlook Email	RE CC/EA/VR List	Adam Bitter	Kristi Hart	Keith Ingram; Christina Adkins		Privileged - Withhold	Attorney Client	Email communication between SOS general counsel and SOS elections division employees regarding CC/EA/VR list
DOC_0807868	Christina Adkins	10/19/2022	Outlook Email	RE CC/EA/VR List	Kristi Hart	Adam Bitter	Keith Ingram; Christina Adkins		Privileged - Withhold	Attorney Client	Email exchange between SOS general counsel and Elections Division staff concerning question from OAG about election officials